

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

|   |   |                          |
|---|---|--------------------------|
| UNITED STATES OF AMERICA                          | § |                          |
|   | § |                          |
| vs.   | § |                          |
|   | § | CRIMINAL NO. 4:24-CR-580 |
| [1] Francisco Jaramillo-Valdovinos, <i>et al.</i> | § |                          |
|   | § |                          |
| <i>Defendants.</i>                                | § |                          |

**JOINT STATUS REPORT ON DISCOVERY**

Pursuant to the Court's order dated February 7, 2025 (Docket No. 233), this joint status report is filed by the United States and Defendants [10] Asad Wali Kesaria, [11] Yossio Resendez, [12] Lorena Araquistain, [14] Victor Garcia-Cisneros, [16] Cliserio Najera-Valenzuela, [19] Abel Delgado-Rojas, [20] Rogelio Zuniga-Reyes, [21] Yonatan Duarte-Garcia, [22] Diego Macentyre-Rodriguez, [23] Andres Ramirez-Duarte, [24] Norberto Coronado-Mata, [25] Mayco Jaimes, [26] Marcos Antonio Zapata, [27] Alex Perez-Sanchez, [28] Kalle Robert Cort, [29] Jose Hernandez-Olvera, [30] Jesus Horacio Garza, [31] Enio Gonzalez-Barreto, [32] Brandy Nikoll Meadows, [33] Othoniel Gonzalez II, and [34] Cristian Alexis Garza, by and through their respective counsel.

**Procedural Background**

On November 7, 2024, a sealed indictment was returned in this matter, charging 34 defendants in Count One with Conspiracy to Launder Monetary Instruments, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h). Several defendants were named on additional counts of Laundering Monetary Instruments, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2, and/or Possession with Intent to Distribute Cocaine/Heroin/Alprazolam, in violation of 21 U.S.C. § 841(a) and (b).

Beginning on or about January 23, 2025, all but 11 defendants<sup>1</sup> were arrested on the pending charges and either retained or were appointed counsel.

The Court designated the case complex on February 7, 2025, and vacated all dates in the scheduling order. The Court ordered the parties to submit a joint status report on discovery by May 9, 2025, and to continue to update the Court every 90 days thereafter. Doc. No. 233.

### **Status of Discovery**

To facilitate the dissemination of discovery in this complex, multi-defendant case, the Court appointed Russell M. Aoki of Aoki Law PLLC as the Coordinating Discovery Attorney on February 26, 2025. Docket No. 257.

The Government provided the first production of discovery to Mr. Aoki in late March 2025. The first production consisted of approximately 355 GB of data. After processing the discovery in accordance with the Court's appointment order, Mr. Aoki made the first production available to all defense counsel in late April 2025.

Pursuant to the Court's appointment order, Mr. Aoki shipped drives containing the first production of discovery to all but one CJA-appointed counsel.<sup>2</sup> These drives were delivered no later than May 6, 2025.

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<sup>1</sup> The 11 fugitive defendants are: [1] Francisco Jaramillo-Valdovinos; [2] Angelberto Quezada-Mejia; [3] FNU LNU a/k/a "Horacio;" [4] Alejandro Olmeda-Rodriguez; [5] Joel Quezada-Reyes; [6] David Mejia-Quezada; [7] Jaime Hugo Sanchez; [8] Diego Gonzalez-Rosales; [13] Aguileo Duarte-Chavez; [15] Primo Hernandez-Garcia; and [18] Juan Contreras-Morales.

<sup>2</sup> CJA-appointed counsel are: Kimberly McTorry (Yossio Resendez); Lori Botello (Victor Garcia-Cisneros); Ali Fazel (Cliserio Najera-Valenzuela); David Adler (Marcos Pineda-Mendoza); Javier Martinez (Abel Delgado-Rojas); Mark Diaz (Rogelio Zuniga-Reyes); Molly Bagshaw (Mayco Jaimes); Adrian Almaguer (Marcos Zapata); Andrew Williams (Alex Perez-Sanchez); Anuj Shah (Jose Hernandez-Olvera); and Paul Morgan (Brandy Meadows).

Retained counsel and one CJA-appointed counsel<sup>3</sup> were asked to send external drives to Mr. Aoki, which would be loaded with the first production of discovery and returned. As of the date of this filing, all retained counsel and one CJA-appointed counsel have sent external drives to Mr. Aoki or are in the process of sending external drives to Mr. Aoki.

The Government is preparing a second production of discovery in this case and anticipates that it will be provided to Mr. Aoki no later than May 31, 2025. Additionally, the Government will make a limited number of productions that are specific to certain defendants and has requested external drives from the counsel who represent those defendants. These defendant-specific productions will not be coordinated through Mr. Aoki.

### **Conclusion**

The discovery process in this complex, multi-defendant case remains ongoing. Once all discovery has been received, the defense will require time to review the discovery, to consider any plea offers from the Government, to decide whether to file any pretrial motions, and/or to prepare for trial.

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<sup>3</sup> Retained counsel are: Sina Zadeh (Nabeel Iqbal); Nathan Mays (Asad Kesaria); Stephen St. Martin and Emmett Leeper (Lorena Araquistain); Erin Epley (Yonatan Duarte-Garcia); James Kennedy (Diego Macentyre-Rodriguez); David Bires (Andres Ramirez-Duarte); Eric Reed (Norberto Coronado); Billy Morian and Reagen Thomas (Kalle Cort); Juan Guerra (Jesus Garza); Mario Madrid (Enio Gonzalez-Barreto); Chip Lewis (Othoniel Gonzalez II); and Wade Smith (Cristian Garza). Due to a recordkeeping error which has been fixed, Paul Morgan (Brandy Meadows) was also requested to send a drive.

The Government and all defense counsel listed in the Certificate of Conference below agree that no trial settings or trial-related deadlines should be imposed at this time. The parties will update the Court on the status of discovery no later than August 7, 2025.

Respectfully submitted,

NICHOLAS J. GANJEI  
United States Attorney

By: /s/ Stephanie Bauman  
Sherin S. Daniel  
Stephanie Bauman  
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**CERTIFICATE OF CONFERENCE**

I hereby certify that I attempted to confer with all defense counsel of record in this case. The counsel listed below have each approved this status report and authorized the filing of the status report as joint. I did not receive a response from two defense counsel.

Nathan Mays  
Counsel for [10] Asad Wali Kesaria

Kimberly McTorry  
Counsel for [11] Yossio Resendez

Stephen St. Martin and Emmett Leeper  
Counsel for [12] Lorena Araquistain

Lori Botello  
Counsel for [14] Victor Garcia-Cisneros

Ali Fazel  
Counsel for [16] Cliserio Najera-Valenzuela

Javier Martinez  
Counsel for [19] Abel Delgado-Rojas

Mark Diaz  
Counsel for [20] Rogelio Zuniga-Reyes

Erin Epley  
Counsel for [21] Yonatan Duarte-Garcia

James Kennedy  
Counsel for [22] Diego Macentyre-Rodriguez

David Bires  
Counsel for [23] Andres Ramirez-Duarte

Eric Reed  
Counsel for [24] Norberto Coronado

Molly Bagshaw  
Counsel for [25] Mayco Jaimes

Adrian Almaguer  
Counsel for [26] Marcos Antonio Zapata

Andrew Williams  
Counsel for [27] Alex Perez-Sanchez

Billy Morian and Reagen Thomas  
Counsel for [28] Kalle Cort

Anuj Shah  
Counsel for [29] Jose Hernandez-Olvera

Juan Guerra  
Counsel for [30] Jesus Horacio Garza

Mario Madrid  
Counsel for [31] Enio Gonzalez-Barreto

Paul Morgan  
Counsel for [32] Brandy Meadows

Chip Lewis  
Counsel for [33] Othoniel Gonzalez II

Wade Smith  
Counsel for [34] Cristian Garza

/s/ Stephanie Bauman  
Stephanie Bauman  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing will be served on all counsel of record upon filing with ECF.

/s/ Stephanie Bauman  
Stephanie Bauman  
Assistant United States Attorney